

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF OKLAHOMA**

(1) MICHAEL DELONG,

Plaintiff,

v.

Case No. 5:14-cv-01439-C

(1) STATE OF OKLAHOMA *ex rel* THE
OKLAHOMA DEPARTMENT OF
MENTAL HEALTH AND
SUBSTANCE ABUSE SERVICES;
(2) THE BOARD OF DIRECTORS FOR
THE OKLAHOMA DEPARTMENT
OF MENTAL HEALTH AND
SUBSTANCE ABUSE SERVICES,
et al

Defendants.

**SUPPLEMENT TO THE WITNESS AND EXHIBIT LISTS OF DEFENDANTS
STATE OF OKLAHOMA EX REL. THE OKLAHOMA DEPARTMENT OF
MENTAL HEALTH AND SUBSTANCE ABUSE SERVICES AND THE BOARD
OF DIRECTORS FOR THE OKLAHOMA DEPARTMENT OF MENTAL
HEALTH AND SUBSTANCE ABUSE SERVICES**

Defendants, State of Oklahoma *ex rel* The Oklahoma Department of Mental Health and Substance Abuse Services and The Board of Directors for the Oklahoma Department of Mental Health and Substance Abuse Services (“Defendants”) submit their Supplement to the Witness and Exhibit Lists filed on March 29, 2016 as follows. These documents were referred to in the deposition of Plaintiff, and/or produced in a binder to Plaintiff at the deposition.

EXHIBIT LIST

<u>No.</u>	<u>Description</u>	<u>Identification/Bates Label</u>	<u>Expectation</u>
32.	M. DeLong's Medical Records from Integris Medical Center	Poff v. ODMHSAS 000002-000016	May Use
33.	List of jobs M. DeLong applied for	Poff v. ODMHSAS 000037-000041	May Use
34.	ODMHSAS Investigative Process Video	ODMH 001542	May Use
35.	All documents and exhibits in the binder of exhibits that were produced to Plaintiff at Plaintiff's deposition in December 2015	Binder Produced at Plaintiff's Deposition	May Use

Discovery is still ongoing in this case; as a result, Defendants reserve the right to amend its Final Witness and Exhibit Lists to the extent additional witnesses and/or documents are identified through the course of further discovery.

Respectfully submitted,

/s/ Victor F. Albert

VICTOR F. ALBERT, OBA #12069
MATTHEW L. WARREN, OBA #31260
CONNER & WINTERS, LLP
1700 One Leadership Square
211 North Robinson
Oklahoma City, OK 73102
Telephone: (405) 272-5711
Facsimile: (405) 232-2695
valbert@cwlaw.com
mwarren@cwlaw.com

*Attorneys for Defendants, State of Oklahoma
ex rel. The Oklahoma Department of Mental
Health and Substance Abuse Services and The
Board of Directors for The Oklahoma
Department of Mental Health and Substance
Abuse Services*

CERTIFICATE OF SERVICE

I hereby certify that on the 1st day of April 2016, I electronically transmitted the attached document to the Clerk of the Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

Rachel L. Bussett, OBA #19769
Ashley Weyland, OBA # 32141
THE BUSSETT LEGAL GROUP, PLLC
Mid-Town Plaza Law Center
414 NW 4th St., Suite 200
Oklahoma City, OK 73102
Telephone: (405) 605-8073
Facsimile: (405) 601-7764
rachel@bussettlaw.com
ashley@bussettlaw.com
Attorneys for Plaintiff

Jeremy Tubb, OBA #16739
Matthew S. Panach, OBA #22262
FULLER, TUBB, BICKFORD & KRAHL
201 Robert S. Kerr, Suite 1000
Oklahoma City, OK 73102
Telephone: (405) 235-2575
Facsimile: (405) 232-8384
jeremy.tubb@fullertubb.com
panach@fullertubb.com
Attorneys for Defendants
Terri White, Durand Crosby,
Cratus Dewayne Moore, and Ellen Buettner

/s/ Victor F. Albert

VICTOR F. ALBERT